

REMARKS/ARGUMENTS

Applicants thank the Examiner for the careful consideration given the present application, and respectfully request favorable reconsideration of the application in view of the comments set forth below.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 4, 8-9, 16, 20, 24, 25, 27, 28 and 54 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,614,809 to Verma *et al.* (hereinafter “Verma”) in view of what is alleged to be well known in the networking art (hereinafter “Knowledge”). However, Applicants respectfully submit that the combination of Verma and Knowledge fails to disclose every feature of the claims.

With regard to claims 4 and 16, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, disclose, or otherwise render predictable an address determination part that selects a caller address for the information-processing device when the information-processing device is the source and a callee address, that is different than the caller address, for the information-processing device when the information-processing device is the destination. Thus, according to claim 4, the address of the information-processing device selected by the address determination part if the information-processing device is the callee is different than the address of the information-processing device selected by the address determination part if the information-processing device is the caller. Verma discloses including an address of an initiator in a Start-Control-connection-Request (“SCCRQ”) message transmitted in an effort to establish tunnel communications. But Verma does not disclose that the address transmitted is selected based on the initiator’s status as the caller, and Verma also fails to disclose that the address of the initiator changes if the initiator is the callee instead of the caller.

In claim 4, a computer-readable memory also stores a relationship that returns a caller address and a callee address. The prior art Verma does not disclose nor suggest such memory. For example, Fig 5A and 5B in the present application show an embodiment of the table of the memory, which assigns an IP address for a caller and an IP address for callee. Based on this

table, the address determination part easily determines the proper IP address for each caller or callee. The effect of this table is not disclosed in the prior art Verma.

In addressing Applicants' previous remarks regarding claims 4 and 16, the Office action alleges that the Applicants are arguing limitations not present in the claims in support of patentability of those claims. Specifically, the Office action explains that there "is nothing in the claim language that indicates that the assigned address changes depending on whether the information-processing device is the caller or the callee." Pg. 5, first paragraph. Applicants respectfully disagree. Claim 4 recites, in pertinent part, that "the caller address is different than the callee address and wherein the address determination part selects the caller address for the information-processing device when the information-processing device is the source and the callee address for the information-processing device when the information-processing device is the destination." Clearly, the address of the information-processing device in claims 4 and 16 does in fact change depending on whether the information-processing device is the caller or the callee, as determined by the claimed judgment part.

Applicants also respectfully submit that it would not be obvious to one of ordinary skill in the art to add distinguishing between the caller and callee with the teachings of Verma as alleged in the Office action. Verma fails to disclose that the initiator, the end point or other terminal makes a distinction, or takes an action based on a distinction between the caller and the callee. Verma discloses that the initiator transmits an address to which the end point can respond, but the address appears to be the same address that the terminal identified as the "initiator" would transmit in response to receiving a connection request. Accordingly, one of ordinary skill in the art would not find it obvious to distinguish between the caller and the callee where there would be no advantage to doing so.

In general, the primary reference, Verma, targets a system with network layer 2 (Data link), and physical addressing (refer P1, Line 14-15). On the contrary, our invention targets a system with network layer 3 (Network), with path determination and logical addressing (IP address). The prior art and the present invention are fundamentally different systems from the view point of network layers.

With regard to claims 20 and 28, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, suggest or otherwise render predictable a server including

an address determination part storing a relationship between a caller address to be assigned to the caller and a callee address to be assigned to the callee for each tunnel communication. For reasons analogous to those provided above for claims 4 and 16, Verma does not disclose making a distinction based on the status of an information-processing device as a caller or callee, and does not disclose assigning a caller address to the caller and a callee address to the callee. Instead, the addresses in Verma can be retrieved via conventional methods such as by placing a DNS call. Such addresses are independent of the status of a calling information-processing device as a caller or callee.

Further with regard to claims 20 and 28, the combination of Verma and Knowledge also fails to teach, disclose or otherwise render predictable that at least one of the callee address and the caller address can be assigned by the address determination part to a different information-processing device participating in different tunnel communications. Servers such as the DNS server disclosed in Verma can store fixed IP-address relationships, and thus do not assign a different address to different information-processing devices during a different tunnel communication depending on whether that information-processing device is the callee or caller.

For at least the above reasons, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, suggest or otherwise render predictable every feature recited in claims 4, 16, 20 and 28 as required to maintain a rejection of those claims for purposes of 35 U.S.C. §103(a). Further, Applicants respectfully submit that one of ordinary skill would not find the absent features obvious in view of the teachings of Verma and Knowledge.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 11-15, 32, 36, 37 and 55-58 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Verma in view of U.S. Patent No. 7,395,354 to Keane *et al.* (hereinafter “Keane”). However, Applicants respectfully submit that the combination of Verma and Keane fails to disclose every feature of the claims.

Regarding claim 32, Applicants respectfully submit that the combination of Verma and Keane fails to teach, suggest or otherwise render predictable a method including a step of defining a relationship between at least a caller address for a caller and a callee address for a

callee in each tunnel communication, where “at least one of the caller address and the callee address is to be used for different information-processing devices involved in a plurality of different tunnel communications.” As claimed, the caller address, the callee address, or both the caller and the callee addresses can be assigned to the respective caller and/or callee in two or more different tunnel communications involving different sets of information-processing devices. By way of example, the same caller address can be assigned to two different information-processing devices, each acting as the caller in two different tunnel communications. As explained in the present application, this is advantageous because it allows for an unlimited number of addresses to be assigned, unlike protocols such as DHCP or AutoIP, or in implementations such as those disclosed in Verma and Keane, for example.

The Office action explains that this limitation is interpreted simply as assigning the same address to both the caller and callee devices, which are two distinct devices. However, such an interpretation fails to observe that the same caller address, for example, is assigned to the caller in two different tunnel communications involving different sets of information-processing devices.

For at least the above reasons, Applicants respectfully submit that the combination of Verma and Keane fails to teach, suggest or otherwise render predictable every feature recited in claim 32 as required to maintain a rejection of that claim for purposes of 35 U.S.C. §103(a). Further, Applicants respectfully submit that one of ordinary skill would not find the absent features obvious in view of the combined teachings of Verma and Keane.

The remaining claims in the present application are allowable for the limitations therein and for the limitations of the claims from which they depend.

In light of the foregoing, it is respectfully submitted that the present application is in condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any fees resulting from this communication, please charge same to our
Deposit Account No. 16-0820, our Order No.: MTIS-40442.

Respectfully submitted,
PEARNE & GORDON, LLP

By: /donald j. firca, jr./
Donald J. Firca, Jr. – Reg. No. 48,140

1801 East 9th Street
Suite 1200
Cleveland, Ohio 44114-3108
(216) 579-1700

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